

From: Carol.M Williams
To: Flowers, Eric
Date: 9/8/2010 11:38 AM
Subject: 26-0107, Tinsley Asphalt, LLC

Eric,

While conducting the annual inspection and records review of the above-referenced facility, I noticed that an amended permit (#461453P) was issued on May 10, 2010 for the source 01 asphalt batch plant. The amended permit changed the fuel from #2 to only natural gas.

The original #461453P (and the amended permit) limit production to 225 tons per hour, daily average basis and 450,000 tons asphalt per 12 consecutive months.

However, if you look at both permits and the examples of the log that are required (condition 15 in original permit and condition 13 in amended permit), you will notice that the log does not require the company to record operating hours or to calculate the daily average. I think this is an oversight unless only the 450,000 tons per 12 consecutive month limit is necessary.

If only the 450,000 12 consecutive month limit matters, the permit should be amended to delete any reference to the 225 TPH, daily average limit. If the 225 TPH, daily average limit does matter, then, the record example in condition 13 should be amended to add the two columns as indicated above.

Your prompt attention to this matter is appreciated. The sooner the needed changes are made, the sooner the company can be complying as needed. This is an NSPS source, after all.

Thanks, Carol